

1 RUSSELL E. MARSH, ESQUIRE
Nevada Bar No. 11198
2 WRIGHT MARSH & LEVY
300 S. Fourth Street
3 Suite 701
Las Vegas, NV 89101
4 Phone: (702) 382-4004
Fax: (702) 382-4800
5 russ@wmllawlv.com
Attorneys for Defendant Parkin
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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA
9

10 UNITED STATES OF AMERICA,)
11 Plaintiff,)
12)
13 vs.)
14 CHARLES PARKIN,)
15 Defendant.)
_____)

CASE NO. 2:15-CR-00212-JCM-NJK

16 **STIPULATION TO CONTINUE SENTENCING HEARING**
17 **(Third Request)**

18 IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by
19 and through its attorney, Christopher Chiou, Acting United States Attorney, through Simon Kung,
20 Assistant United States Attorney; and Defendant Charles Parkin, by and through his counsel, Russell
21 E. Marsh, Esquire, Wright Marsh & Levy, that the Sentencing Hearing currently scheduled for July
22 14, 2021, be vacated and set to a date and time convenient to this Court, but no sooner than 21 days
23 from the current hearing date.

24 This stipulation is entered into for the following reasons:

- 25 1. This matter is currently set for Sentencing on July 14, 2021, at 10:00 a.m. (ECF No.
26 129.)
- 27 2. Counsel for Mr. Parkin is still dealing with a family medical situation that will
28 involve out-of-state travel the week when sentencing is currently scheduled. Counsel also requires

1 additional time to prepare the Sentencing Memorandum and to prepare letters of support and other
2 documents for filing in connection with sentencing.

3 3. Counsel for Mr. Parkin is also unavailable the week of August 9, 2021, because of
4 previously scheduled international travel.

5 4. The parties agree to continue the Sentencing Hearing for two weeks. Mr. Parkin is
6 out of custody and agrees to the continuance.

7 5. Additionally, denial of this request for continuance could result in a miscarriage of
8 justice.

9 6. The additional time requested by this Stipulation is made in good faith and not for
10 purposes of delay.

11 7. This is the third request for a continuance of the Sentencing Hearing.

12 Dated this 6th day of July, 2021.

13 Respectfully submitted:

14 WRIGHT MARSH & LEVY

CHRISTOPHER CHIOU
ACTING UNITED STATES ATTORNEY

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16 BY /s/ Russell E. Marsh
17 RUSSELL E. MARSH, ESQUIRE
Attorney for Defendant Parkin

BY /s/ Simon Kung
SIMON KUNG
Assistant U.S. Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,)
4 Plaintiff,)
5 vs.)
6 CHARLES PARKIN,)
7 Defendant.)
8


CASE NO. 2:15-CR-00212-JCM-NJK

ORDER

9 Based on the Stipulation of the parties, the Sentencing Hearing in this matter is hereby
10 continued. The ends of justice served by granting said continuance outweigh the best interest of the
11 public and the defendant in a hearing, since the failure to grant said continuance would be likely to
12 result in a miscarriage of justice, and would deny the parties herein sufficient time and the
13 opportunity within which to be able to effectively and thoroughly prepare for the hearing, taking into
14 account the exercise of due diligence.

15 IS IT HEREBY ORDERED that the Sentencing Hearing in the above-captioned matter
16 currently scheduled for July 14, 2021, at 10:00 a.m., be vacated and continued to
17 August 19, 2021 at 10:00 a.m .

18 DATED: July 7, 2021

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21 JAMES C. MAHAN
22 United States District Judge
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